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6 Attorneys for Defendant
SIERRA PACIFIC MORTGAGE
7 COMPANY, INC.

8 UNITED STATES DISTRICT COURT
9 NORTHERN DISTRICT OF CALIFORNIA
10 SAN FRANCISCO DIVISION

11 DEVIN COLE, on behalf of himself and all
12 others similarly situated,

13 Plaintiff,

14 v.

15 SIERRA PACIFIC MORTGAGE COMPANY,
INC., and DOES 1 through 10, inclusive,

16 Defendant.

Case No. 3:18-CV-01692-JCS

CLASS ACTION

**JOINT STIPULATION FOR ORDER
CONTINUING DEADLINES BY SIXTY
DAYS; ~~PROPOSED~~ ORDER (L.R. 6-2)**

The Honorable Joseph C. Spero
Complaint Filed: March 19, 2018
Trial Date: None Set

Pursuant to Northern District Local Rule 6-2, plaintiff Devin Cole (“Cole”) and defendant Sierra Pacific Mortgage Company, Inc. (“SPMC”) hereby stipulate and respectfully request that the Court grant sixty-day continuance of all currently scheduled deadlines, including deadline for SPMC’s response to the Complaint. The parties declare in support of this request:

WHEREAS, Cole filed the instant action on March 19, 2018;

WHEREAS, SPMC must currently respond to the Complaint by May 11, 2018;

WHEREAS, on March 20, 2018, the Court entered its Order Setting Initial Case Management Conference and ADR deadlines (ECF 5) and setting the Initial Case Management Conference for June 22, 2018;

WHEREAS, the parties have agreed to engage in an informal exchange of information in an effort to settle this action early;

WHEREAS, the parties jointly desire to avoid further expenditure of the Court’s resources or their resources on this litigation given the significant possibility that the case will be voluntarily dismissed without further burden on the Court;

WHEREAS, there has only been one prior time modification in this case; and

WHEREAS, in light of the above and in order to facilitate the settlement discussions, the parties jointly stipulate to and respectfully request this Court grant an approximate sixty-day continuance of all currently scheduled deadlines, including the response to the Complaint, and for the dates to be set as follows:

	Deadline	New Deadline
Response to Complaint	5/11/2018	7/10/2018
Last Day to meet and confer re: initial disclosures, early settlement, ADR process selection, and discovery plan	6/1/2018	7/31/2018
Last Day to file ADR Certification signed by Parties and Counsel	6/1/2018	7/31/2018
Last Day file either Stipulation to ADR Process or Notice of Need for ADR Phone Conference	6/1/2018	7/31/2018
Last day to file Rule 26(f) Report, complete initial disclosures or state objection in Rule 26(f) Report and file Case Management Statement per Standing Order re Contents of Joint Case Management Statement	6/15/2018	8/14/2018

	Deadline	New Deadline
Initial Case Management Conference (CMC) at 2:00 PM	6/22/2018	8/24/2018

SO STIPULATED.

DATED: May 9, 2018

Respectfully submitted,

BALLARD SPAHR LLP
Scott M. Pearson
Kay Fitz-Patrick

By: /s/ Kay Fitz-Patrick
Kay Fitz-Patrick

Attorneys for Defendant
SIERRA PACIFIC MORTGAGE
COMPANY, INC

DATED: May 9, 2018

LAW OFFICE OF DAVID W. MARTIN
David W. Martin

LESTER & ASSOCIATES
Patric A. Lester

By: /s/ David W. Martin
David W. Martin

Attorneys for Plaintiff
DEVIN COLE


N.D. Cal. Rule 5-1(i)(3) ATTESTATION

In compliance with Northern District Local Rule 5-1(i)(3), I, Kay Fitz-Patrick, hereby attest that David W. Martin has concurred in this filing. /s/ Kay Fitz-Patrick

~~PROPOSED~~ ORDER

PURSUANT TO STIPULATION, IT IS SO ORDERED.

DATED: May 10, 2018


The Honorable Joseph C. Spero
Chief Magistrate Judge

CERTIFICATE OF SERVICE

I hereby certify that on this 9th day of May, 2018, I electronically filed a true and correct copy of the foregoing **JOINT STIPULATION FOR ORDER CONTINUING DEADLINES BY SIXTY DAYS; [PROPOSED] ORDER (L.R. 6-2)** through the Court's CM/ECF system, which will send a notice of electronic filing to the following:

Law Offices of David W. Martin David Wayne Martin Email: davidwmartin@email.com Lester & Associates Patric A. Lester Email: pl@lesterlaw.com	<i>Attorneys for Plaintiff</i>
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/s/ Kay Fitz-Patrick
Kay Fitz-Patrick